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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ALICIA INES MOYA GARAY, JUAN
JAIME LOPEZ-JIMENEZ, and ARRIBA
LAS VEGAS WORKER CENTER,

Plaintiffs,

vs.

CITY OF LAS VEGAS, UNITED STATES
IMMIGRATION AND CUSTOMS
ENFORCEMENT, et al.,

Defendants.

Case No.: 2:20-cv-00119-ART-EJY

ORDER GRANTING

STIPULATION FOR EXTENSION OF
TIME FOR BRIEFING OF FEDERAL
DEFENDANTS' MOTION TO DISMISS
(FIRST REQUEST)

**STIPULATION AND ORDER FOR EXTENSION OF TIME FOR BRIEFING OF
FEDERAL DEFENDANTS' MOTION TO DISMISS**

Plaintiffs Alicia Ines Moya Garay, Juan Jaime Lopez-Jimenez, and Arriba Las Vegas Worker Center ("Plaintiffs") and Defendants United States Immigration and Customs Enforcement ("ICE"), Tae D. Johnson, and Michael Bernacke ("Federal Defendants"), by and through their respective counsel of record, hereby stipulate as follows:

On October 16, 2024, the Court granted the parties Stipulated Discovery Plan and Scheduling Order, which included a deadline for Plaintiffs to file a fourth amended complaint and for Defendants to file their response (December 17, 2024) (Dkt. No. 141);

On November 5, 2024, the Court docketed Plaintiffs' Fourth Amended Complaint (Dkt. No. 144);

On December 17, 2024, Federal Defendants filed a Motion to Dismiss Plaintiffs' Fourth Amended Complaint (Dkt. No. 148), which automatically set Plaintiffs' response deadline as December 31, 2024;

The Parties have conferred and agreed to a 30-day extension of Plaintiffs' deadline to respond to the Motion to Dismiss from December 31, 2024, to January 30, 2025, to allow counsel for Plaintiffs sufficient time to prepare such response given the topics raised by the motion to dismiss and due to the intervening holidays;

The Parties have conferred and agreed to a 30-day extension of Federal Defendants' deadline to file a reply to Plaintiffs' response from February 6, 2025 (seven days – under LR 7-2(b) – after Plaintiffs' new deadline), to March 10, 2025 (the next Monday after 30 added days);

The filer of this document attests that the concurrence in the filing of this document has been obtained from counsel for Federal Defendants under LR IC 5-1(d);

No trial date has been set for this action, the extension requested is not intended for

1 purposes of delay, and no party will be prejudiced by the extension requested.

2 This is the first request for extension of time in this matter.

3 The Parties respectfully request that, for good cause show, the Court enter an order
4 extending Plaintiffs' deadline to respond to the Motion to Dismiss by thirty (30) days to January
5 30, 2025, and extending Federal Defendants' deadline to file a reply by thirty (30) days to March
6 10, 2025.

7 The Parties stipulate and agree, through their undersigned counsel, subject to the Court's
8 approval, that Plaintiffs will have until January 30, 2025, to file their response to the Motion to
9 Dismiss, and that Federal Defendants will have until March 10, 2025, to file their reply in support
10 of their motion.

11 Respectfully submitted,

12
13 Dated: December 20, 2024

**MEXICAN AMERICAN LEGAL DEFENSE
AND EDUCATIONAL FUND**

/s/ Ernest Herrera

Ernest Herrera
Luis L. Lozada
Leticia M. Saucedo
**MEXICAN AMERICAN LEGAL DEFENSE
AND EDUCATIONAL FUND**

F. Travis Buchanan
F. TRAVIS BUCHANAN, ESQ.,
& ASSOC., PLLC

Attorneys for Plaintiffs

22 Dated: December 20, 2024

U.S. DEPARTMENT OF JUSTICE

/s/ J. Max Weintraub

Brian M. Boynton
August E. Flentje
J. Max Weintraub
**U.S. DEPARTMENT OF JUSTICE
CIVIL DIVISION**

Attorneys for Federal Defendants

IT IS SO ORDERED:

A handwritten signature in black ink, appearing to read "Anne R. Traum". The signature is written in a cursive, flowing style.

Anne R. Traum
United States District Judge

DATED: December 23, 2024